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November 27, 2018

Via Electronic Filing

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, SC 29210

RE: 2018 Integrated Resource Plan Annual Report Applications of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC
Docket Nos. 2018-8-E and 2018-10-E)

Dear Ms. Boyd:

South Carolina Coastal Conservation League (“CCL”), Southern Alliance for Clean Energy (“SACE”), and Upstate Forever (“UF”) (together, “Conservation Groups”) submit this letter in support of the South Carolina Solar Business Alliance, Inc.’s (“SCSBA”) request to the Commission to allow an extension of time until January 31, 2019 for submission of analyses of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC’s 2018 Integrated Resource Plans for South Carolina (the “SC IRPs”).

The Conservation Groups are currently working together and seeking to retain qualified experts to conduct comprehensive assessments of the SC IRPs. As noted in our Petition to Intervene, the Conservation Groups plan to file comments on the SC IRPs to promote “a low-cost, reliable portfolio of supply-and-demand-side resources with minimal harmful environmental impacts and costs to ratepayers.” The issues involved in the integrated resource planning process and raised by Duke Energy are complex. The Conservation Groups are concerned that the current deadline will not allow sufficient time for careful review of the IRP itself, detailed analysis of responses to data requests, and thoughtful preparation of comments.

The Southern Environmental Law Center also represents SACE and other aligned client groups in the North Carolina Integrated Resource Plan proceeding for Duke Energy Carolinas, LLC and Duke Energy Progress, LLC before the North Carolina Utilities Commission. (Docket No. E-100, Sub 157). The deadline for testimony in the North Carolina docket is February 4, 2019, later than the corresponding deadlines for the South Carolina IRPs. An extended deadline in the South Carolina proceedings would allow us to more efficiently coordinate the related evaluations of the North Carolina and South Carolina Duke Energy IRPs. For the reasons above as well as those offered by the SCSBA, the Conservation Groups would appreciate an extension until January 31, 2019 to submit Comments to the Commission.

Please contact me if you have any questions concerning this filing.

Sincerely,

/s/ Stinson W. Ferguson

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CC: Parties of Record